# **REMARKS**

Applicants are amending dependent Claim 2 to clarify the claimed invention.

Applicants will address each of the Examiner's rejections in the order in which they appear in the Office Action.

## Claim Rejections - 35 USC §102

In the Office Action, the Examiner rejects Claims 1-3, 5, 10 and 12 under 35 USC §102(b) as being anticipated by Hamada (US 6,114,715). This rejection is respectfully traversed.

More specifically, independent Claim 1 includes the feature of "a partition wall covering an edge of the first electrode." In the Office Action, the Examiner cites "(54+2)" as covering first electrode (103) in Fig. 8 of <u>Hamada</u> as showing this feature. Applicants respectfully disagree and submit that this feature is not shown in the cited reference. If the Examiner continues to believe that this feature is shown in <u>Hamada</u>, then Applicants respectfully request that the Examiner provide a further explanation as to how <u>Hamada</u> discloses this feature.

Accordingly, it is respectfully requested that this rejection be withdrawn.

## Claim Rejections - 35 USC §103

#### Claims 8, 11 and 13-15

The Examiner also rejects Claims 8, 11 and 13-15 under 35 USC §103(a) as being unpatentable over Hamada. This rejection is also respectfully traversed.

Each of these claims is a dependent claim. Therefore, for at least the reasons discussed above for independent Claim 1, these claims are also allowable over the cited reference. Accordingly, it is respectfully requested that this rejection be withdrawn.

#### Claim 9

The Examiner also rejects Claim 9 under 35 USC §103(a) as being unpatentable over Hamada in view of Oda et al. (US 6,396,208). This rejection is also respectfully traversed.

This claim is a dependent claim. Therefore, for at least the reasons discussed above for independent Claim 1, this claim is also allowable over the cited references. Further, Applicants respectfully submit that neither of the cited references disclose or suggest the claimed feature of wherein the first electrode "is formed in a self-aligning manner using the partition wall as a mask." Accordingly, it is respectfully requested that this rejection be withdrawn.

## Claims 1-2, 4-5, 8, 10-15

The Examiner also rejects Claims 1-2, 4-5, 8, 10-15 (again) under 35 USC §103(a) as being unpatentable over Hamada in view of Iwase et al. (US 6,768,534). This rejection is also respectfully traversed.

Each of these claims is patentable over the cited references for at least the reasons discussed above. Accordingly, it is respectfully requested that this rejection be withdrawn.

## Claim 9

The Examiner also rejects Claim 9 (again) under 35 USC §103(a) as being unpatentable over Hamada in view of Iwase in view of Oda. This rejection is also respectfully traversed.

This claim is a dependent claim. Therefore, for at least the reasons discussed above for independent Claim 1, this claim is also allowable over the cited references. Further, Applicants respectfully submit that none of the cited references disclose or suggest the claimed feature of wherein the first electrode "is formed in a self-aligning manner using the partition wall as a mask."

Information Disclosure Statement

Applicants are submitting an information disclosure statement (IDS) herewith. Applicants

also filed an IDS on July 12, 2005 (received by the PTO on July 14, 2005). It is respectfully

requested that these IDSs be entered and considered at this time and prior to the issuance of any

further action for this application.

Conclusion

Therefore, Applicants respectfully submit that the present application is in a condition for

allowance and should be allowed.

If any further fee is due for this amendment, please charge our deposit account 50/1039.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,

Date: October 12, 2005

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wherein the first electrode "is formed in a self-aligning manner using the partition wall as a mask."

Accordingly, it is respectfully requested that this rejection be withdrawn.

## **New Claims**

Applicants are adding new Claims 23-66 herewith. New independent Claims 23, 37 and 53 include the feature of a light-absorbing multilayer film. Claims 23 and 37 include the feature that the multi-layer film includes three layers formed of different materials. Theses feature were originally presented in dependent Claim 6 which has now been canceled. The independent claims also include the feature of Claim 1 of a partition wall covering an edge of the first electrode. Hence, these claims are allowable for at least the reasons discussed above.

The fee for new claims has been calculated as shown below.

	Claims Remaining After		Highest Number Previously	Present		
+	Amendment		Paid For	Extra	Rate	Fee
Total	58	-	22	36	(small entity) x 25 (others) x 50	\$1800.00
Independent	4	-	3	1	(small entity) x 100 (others) x 200	\$200.00
Multiple Dependent (None) (small entity) + 180 (others) + 360						\$0.00
TOTAL ADDITIONAL FEES						\$2000.00

Applicants are enclosing the \$2000.00 fee for the new claims and new independent claims. If any further fee is due, please charge our deposit account 50/1039.

Accordingly, it is respectfully requested that this rejection be withdrawn.

## Claim 1-8 and 10-15

The Examiner also rejects Claim 1-8 and 10-15 (again) under 35 USC §103(a) as being unpatentable over Hamada in view of Kanada et al. (JP 2000-269473). This rejection is also respectfully traversed.

As explained above, Applicants respectfully submit that <u>Hamada</u> does not disclose or suggest all of the claimed elements of independent Claim 1. The Examiner citation of <u>Kanada</u> does not cure this deficiency. Therefore, it is respectfully requested that this rejection be withdrawn.

In addition, the Examiner cites <u>Kaneda</u> in the rejection of dependent Claims 6-7 and contends that <u>Kanada</u> discloses the SiO2 layer as being replaced with silicon nitride and cites [0016] in <u>Kaneda</u> in support thereof. Applicants are submitting herewith a translation of paragraph [0016] of JP 2000-269473. Applicants can find no support for the Examiner's contention of replacing SiO2 with silicon nitride in this paragraph.

Accordingly, for at least the above-stated reasons, it is respectfully requested that this rejection be withdrawn.

#### Claim 9

The Examiner also rejects Claim 9 (again) under 35 USC §103(a) as unpatentable over Hamada in view of Kanda et al. in view of Oda et al. This rejection is also respectfully traversed.

This claim is a dependent claim. Therefore, for at least the reasons discussed above for independent Claim 1, this claim is also allowable over the cited references. Further, Applicants respectfully submit that none of the cited references disclose or suggest the claimed feature of

Partial Translation of JP 2000-269473 translated by applicant

[0016] As explained above, it is possible to further increase the light absorption ratio by suppressing the reflection on the interface between titanium nitride and SiO<sub>2</sub> as the interlayer insulating film because the reflection on the interface therebetween contributes the light absorbing ratio of the light absorption layer. The inventors invent that it is possible to further increase the light absorption ratio by providing a specific reflection inhibiting film on the interface. That is, the maximum light absorption ratio increases to about 99% by providing silicon nitride with a thickness of 40-100 nm as a reflection inhibiting film. Fig. 4 shows this feature.